



23490 Connecticut Street
Hayward, California 94545
510.773-9137-510.782-8584 Fax

November 1, 2004

Mr. William J. Gaffney
NAPA SANITATION DISTRICT
935 Hartle Court
Napa, CA 94559

Re: September 2004 Compliance Monitoring Results for the Jefferson Car Wash Site Groundwater Extraction and Treatment System, 3080 Jefferson Street, Napa, California, Industrial User Permit No. 495950.

Dear Mr. Gaffney:

This letter presents the results of September 2004 Compliance Monitoring for the Groundwater Extraction and Treatment System (System) at the Jefferson Car Wash site, 3080 Jefferson Street, Napa, California. Compliance monitoring and reporting have been conducted in accordance with the guidelines stipulated in the Industrial User Permit No. 495950. Presented herein are the results of the 6th compliance monitoring event after System start-up, which occurred on March 29, 2004.

The compliance monitoring activities for this reporting period were performed by Decon Environmental Services, the operations and maintenance (O&M) contractor for the System, under the direction of Malcolm Pirnie on October 19, 2004. The monitoring activities included:

1. Sampling the System effluent.
2. Recording the total volume of raw water discharged from individual extraction wells (EW-2 and EW-3).
3. Recording the total volume of treated water discharged to sanitary sewer.

Per the Permit requirements, effluent samples were analyzed for total petroleum hydrocarbons as diesel (TPH-D) by United States Environmental Protection Agency (USEPA) Method 8015M, TPH as gasoline (TPH-G), benzene, toluene, ethylene, total xylenes (BTEX), and methyl-tertiary-butyl ether (MTBE) by USEPA Method 8260B, and total lead by USEPA Method 200.7.

Table 1 presents the analytical results for the System effluent and the System flow parameters. The analytical laboratory report is attached.

Mr. William J. Gaffney
NAPA SANITATION DISTRICT

August 26, 2004
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The analytical laboratory reported the concentrations of constituents of concern to be non-detect in the System effluent. The average daily discharge rate for this reporting period was estimated to be 4.9 gallons per minute (gpm), which was below the 8 gpm limit. A total of 343,980 gallons of treated water was discharged to the sanitary sewer during this reporting period.

Please contact Jason at (510) 732-6444 Ext. 17 or Todd Miller with Malcolm Pirnie at (510) 735-3014 to discuss any comments or questions.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that a qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

DECON ENVIRONMENTAL SERVICES



Jason Gulbransen
Project Manager

Attachments: Table 1, Analytical Laboratory Report

c: George Altamura, Altamura Enterprises
Joel Coffman, Napa County
Todd Miller, Malcolm Pirnie
File (4459-008)

P:\4459\008\GWTS Compliance Monitoring\September 2004 Compliance Monitoring Letter Report.doc

Table 1: Compliance Monitoring Results, September 2004
Interim Groundwater Extraction and Treatment System
Jefferson Car Wash Site
Industrial User Permit No: 495950

Parameter	Units	USEPA Method	Date Collected	System Effluent	Permitted Reporting Limit ¹
Volatile Organic Compounds					
Methyl Tertiary-Butyl Ether	µg/L ⁶	8260B	10/19/2004	< 1	1.0% LEL ⁴
Benzene	µg/L	8260B	10/19/2004	< 0.5	1.0% LEL
Toluene	µg/L	8260B	10/19/2004	< 0.5	1.0% LEL
Ethylbenzene	µg/L	8260B	10/19/2004	< 0.5	1.0% LEL
Xylenes, Total	µg/L	8260B	10/19/2004	< 1	1.0% LEL
TPH as Gasoline	µg/L	8260B	10/19/2004	< 25	-- ⁵
TPH as Diesel	µg/L	8015M	10/19/2004	< 50	--
Total Lead	mg/L ⁷	200.7	10/19/2004	< 0.05	0.14
Operational					
Total Volume Discharged to Sanitary Sewer ²	gallons	--	10/19/2004	343,980	--
Daily Average System Flow Rate ³	gpm ⁸	--	10/19/2004	4.88	8

Notes:

¹ As stated in Industrial User Permit, No: 495950, issued for the System on 03/02/2004.

² The sum of volumes extracted from individual wells, EW-2 and EW-3, for this period as recorded by the flow totalizer at the respective well-head.

i.e., { Sum of Flow Totalizer Volume at EW-2 and EW-3 for this period } -
{ Sum of Flow Totalizer Volume at EW-2 and EW-3 for the previous period }

³ Calculated as the Total Volume Discharged to Sanitary Sewer divided by the number of days the system was in operation during the reporting period (49 days for this period).

⁴ Lower explosive limit.

⁵ No reporting limit stated or not applicable.

⁶ Micrograms per liter.

⁷ Milligrams per liter.

⁸ Gallons per minute.

Entech Analytical Labs, Inc.

3334 Victor Court • Santa Clara, CA 95054 • (408) 588-0200 • Fax (408) 588-0201

Jason Gulbransen
Decon Environmental Services, Inc.
23490 Connecticut Street
Hayward, CA 94545

Certificate ID: 40955 - 10/26/2004 12:09:47 PM

Order: 40955
Project Name: Jefferson Carwash
Project Number: 4470

Date Collected: 10/19/2004
Date Received: 10/21/2004
P.O. Number: 4470

Certificate of Analysis - Final Report

On October 21, 2004, sample was received under chain of custody for analysis. Entech analyzes samples "as received" unless otherwise noted. The following results are included:

<u>Matrix</u>	<u>Test</u>	<u>Method</u>	<u>Comments</u>
Liquid	8260Petroleum	EPA 8260B	8260Petroleum=Btex+MTBE ONLY
	Lead	EPA 200.7	
	TPH as Gasoline - GC/MS	GC-MS	
	TPH-Extractable	EPA 8015 MOD. (Extractable)	Report Diesel ONLY

Entech Analytical Labs, Inc. is certified for environmental analyses by the State of California (#2346).
If you have any questions regarding this report, please call us at 408-588-0200 ext. 225.

Sincerely,



Laurie Glantz-Murphy
Laboratory Director

Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

Decon Environmental Services, Inc.
23490 Connecticut Street
Hayward, CA 94545
Attn: Jason Gulbransen

Project Number: 4470
Project Name: Jefferson Carwash
Date Received: 10/21/2004
P.O. Number: 4470
Sampled By: Client

Certificate of Analysis - Data Report

Lab # : 40955-001 Sample ID: Discharge Point

Matrix: Liquid Sample Date: 10/19/200 8:30 AM

Method: EPA 200.7 / EPA 3010B / Acid Digestion for ICP for 6010B

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Lead	ND		1	0.05	mg/L	10/21/2004	WM041021	10/25/2004	WICP1041025

Analyzed by: JIsiderio

Reviewed by: MFELIX

Method: EPA 8015 MOD. (Extractable) / EPA 3510C / Sep. funnel liquid/liquid extraction

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Diesel	ND		1	50	µg/L	N/A	N/A	10/23/2004	DW4818A

Surrogate	Surrogate Recovery	Control Limits (%)
o-Terphenyl	67.0	22 - 133

Analyzed by: JZaininger

Reviewed by: LGLANTZ

Method: EPA 8260B / EPA 5030B / Purge & Trap

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
Benzene	ND		1	0.5	µg/L	N/A	N/A	10/22/2004	WMS5041021B
Toluene	ND		1	0.5	µg/L	N/A	N/A	10/22/2004	WMS5041021B
Ethyl Benzene	ND		1	0.5	µg/L	N/A	N/A	10/22/2004	WMS5041021B
Xylenes, Total	ND		1	1	µg/L	N/A	N/A	10/22/2004	WMS5041021B
Methyl-t-butyl Ether	ND		1	1	µg/L	N/A	N/A	10/22/2004	WMS5041021B

Surrogate	Surrogate Recovery	Control Limits (%)
4-Bromofluorobenzene	91.9	75 - 109
Dibromofluoromethane	99.5	79 - 122
Toluene-d8	86.5	85 - 111

Analyzed by: Jhsiang

Reviewed by: MTU

Method: GC-MS

Parameter	Result	Flag	DF	Detection Limit	Units	Prep Date	Prep Batch	Analysis Date	QC Batch
TPH as Gasoline	ND		1	25	µg/L	N/A	N/A	10/22/2004	WMS5041021B

Surrogate	Surrogate Recovery	Control Limits (%)
4-Bromofluorobenzene	91.9	75 - 109
Dibromofluoromethane	99.5	79 - 122
Toluene-d8	86.5	85 - 111

Analyzed by: Jhsiang

Reviewed by: MTU

Entech Analytical Labs, Inc.

3334 Victor Court , Santa Clara, CA 95054

Phone: (408) 588-0200

Fax: (408) 588-0201

Quality Control - Method Blank

Liquid

Validated by: LGLANTZ - 10/25/04

QC Batch ID: DW4818A

Analysis Date: 10/22/2004

Method Blank

Method: EPA 8015 MOD. (Extractable)

Parameter	Result	DF	PQLR	Units
TPH as Diesel	ND	1	50	µg/L
TPH as Kerosene	ND	1	50	µg/L
TPH as Mineral Spirits (Stoddard)	ND	1	50	µg/L
TPH as Motor Oil	ND	1	250	µg/L

Surrogate for Blank	% Recovery	Control Limits
o-Terphenyl	79.0	22 - 133

Entech Analytical Labs, Inc.

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Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by: LGLANTZ - 10/25/04

QC Batch ID: DW4818A

Analysis Date: 10/22/2004

LCS		Method: EPA 8015 MOD. (Extractable)					Conc. Units: µg/L		
Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<5	1000	496	LCS	10/22/2004	49.6			35 - 109

Surrogate	% Recovery	Control Limits
o-Terphenyl	75	22 - 133

LCSD		Method: EPA 8015 MOD. (Extractable)					Conc. Units: µg/L		
Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Diesel	<5	1000	530	LCSD	10/22/2004	53.0	6.6	25	35 - 109

Surrogate	% Recovery	Control Limits
o-Terphenyl	86	22 - 133

Entech Analytical Labs, Inc.

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Quality Control - Method Blank

Liquid

Validated by: MTU - 10/25/04

QC Batch ID: WMS5041021B

Analysis Date: 10/22/2004

Method Blank Method: EPA 8260B

Parameter	Result	DF	PQLR	Units
Benzene	ND	1	0.5	µg/L
Ethyl Benzene	ND	1	0.5	µg/L
Methyl-t-butyl Ether	ND	1	1	µg/L
Toluene	ND	1	0.5	µg/L
Xylene, m+p	ND	1	1	µg/L
Xylene, o	ND	1	0.5	µg/L
Xylenes, Total	ND	1	1	µg/L

Surrogate for Blank	% Recovery	Control Limits
4-Bromofluorobenzene	87.9	75 - 109
Dibromofluoromethane	92.2	79 - 122
Toluene-d8	93.2	85 - 111

Entech Analytical Labs, Inc.

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Quality Control - Method Blank

Liquid

Validated by: MTU - 10/25/04

QC Batch ID: WMS5041021B

Analysis Date: 10/22/2004

Method Blank

Method: EPA 8260B

Parameter	Result	DF	PQLR	Units
TPH as Gasoline	ND	1	25	µg/L

Entech Analytical Labs, Inc.

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Quality Control - Laboratory Control Spike / Duplicate Results

Liquid

Reviewed by: MTU - 10/25/04

QC Batch ID: WMS5041021B

Analysis Date: 10/22/2004

LCS Method: EPA 8260B							Conc. Units: µg/L		
Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
Benzene	<0.2	20.0	19.1	LCS	10/22/2004	95.5			77 - 154
Methyl-t-butyl Ether	<0.3	20.0	21.5	LCS	10/22/2004	108			58 - 127
Toluene	<0.2	20.0	18.7	LCS	10/22/2004	93.5			47 - 137
Surrogate	% Recovery	Control Limits							
4-Bromofluorobenzene	102	75 - 109							
Dibromofluoromethane	101	79 - 122							
Toluene-d8	88.8	85 - 111							

LCSD		Method: EPA 8260B				Conc. Units: µg/L				
Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits	
Benzene	<0.2	20.0	19.1	LCSD	10/22/2004	95.5	0.0	25	77 - 154	
Methyl-t-butyl Ether	<0.3	20.0	22.5	LCSD	10/22/2004	113	4.5	25	58 - 127	
Toluene	<0.2	20.0	19.0	LCSD	10/22/2004	95.0	1.6	25	47 - 137	
Surrogate	% Recovery	Control Limits								
4-Bromofluorobenzene	103	75 - 109								
Dibromofluoromethane	102	79 - 122								
Toluene-d8	90.2	85 - 111								

LCS Method: GC-MS							Conc. Units: µg/L		
Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<6.45	250	225	LCS	10/22/2004	90.0			65 - 135
Surrogate	% Recovery	Control Limits							
4-Bromofluorobenzene	97.7	75 - 109							
Dibromofluoromethane	101	79 - 122							
Toluene-d8	91	85 - 111							

LCSD Method: GC-MS		Conc. Units: µg/L							
Parameter	Blank	Spike Amt	SpikeResult	QC Type	Analysis Date	% Recovery	RPD	RPD Limits	Recovery Limits
TPH as Gasoline	<6.45	250	239	LCSD	10/22/2004	95.7	6.1	25	65 - 135
Surrogate	% Recovery	Control Limits							
4-Bromofluorobenzene	98.2	75 - 109							
Dibromofluoromethane	97.9	79 - 122							
Toluene-d8	88.6	85 - 111							



CHAIN OF CUSTODY REPORT

JOB NUMBER AND NAME:

4470 Jefferson Car Wash Gwts

REPORT AND BILL TO:

DECON Environmental Services, Inc.
23490 Connecticut Street
Hayward, CA 94545
(510) 732-6444

@ 1050 Pueblo Ave, NAPA CA

SAMPLER: J. Gelhausen

DATE: 10-19-04

SAMPLE ID / STATION

DISCHARGE POINT

SAMPLE DESCRIPTION

WATER 40955-001

CONTAINERS NUMBER

5

SAMPLING TIME / DATE

830 10-19

ANALYSIS REQUESTED

TPH GAS by GC/MS
TPH DIESEL
TOTAL LEAD

REMARKS

1,248,500 GALS

SEPTEMBER 2004
MONTHLY SAMPLE

TURNAROUND TIME:

3 DAY

3 DAYS

RELINQUISHED BY:

J. Gelhausen

RELINQUISHED BY:

J. Gelhausen

RELINQUISHED BY:

J. Gelhausen

DATE: 10/20/04

DATE: 10-19-04

DATE: 10/21/04

DATE: 10/21/04

TIME: 1655

TIME: 1130

TIME: 1215

TIME: 1215

RECEIVED BY:

J. Gelhausen

RECEIVED BY:

J. Gelhausen

RECEIVED IN LAB BY:

J. Gelhausen

Laboratory Use Only:
Were samples:

preserved/on ice?

in good condition?

labeled?

Yes

No

* G = Grab C = Composite W = Wipe